

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JUANA DOE I et al,

Plaintiffs,

v.

IFC ASSET MANAGEMENT COMPANY,
LLC,
INTERNATIONAL FINANCE
CORPORATION,

Defendants.

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Dated: May 30, 2018

Civil Action No. 17-1494-JFB-SRF

FILED UNDER SEAL

**PLAINTIFFS' UNOPPOSED MOTION
TO FILE FIRST AMENDED
COMPLAINT UNDER SEAL**

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**PLAINTIFFS’ UNOPPOSED MOTION TO FILE FIRST AMENDED
COMPLAINT UNDER SEAL**

Plaintiffs hereby move to have Plaintiffs’ First Amended Complaint (FAC), D.I. 38, removed from the public docket and filed under seal, and to replace D.I. 38 in the public record with the attached, redacted version of the First Amended Complaint. Defendants have indicated that they do not object.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. Background.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Filing under seal is justified.

[REDACTED]

[REDACTED] Courts have regularly held that filing information under seal is permitted when there are safety concerns for the plaintiff or others. *See Rossbach v. Rundle*, 128 F. Supp. 2d 1348, 1350 (S.D. Fla. 2000)(sealing discovery motions to prevent subjecting non-parties to unwanted publicity); *Yaman v. United States Dep't of State*, 786 F. Supp. 2d 148, 154 (D.D.C. 2011) (plaintiff permitted to file her address under seal because of her interest in protecting her minor daughters); *Doe v. City of San Diego*, 2014 U.S. Dist. LEXIS 66535, *18 (S.D. Cal. May 14, 2014) (plaintiff permitted to keep her identifying information confidential).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Relief requested.

For these reasons, Plaintiffs respectfully request leave to have the unredacted FAC, D.I. 38, filed under seal. The sealing would remain for the remainder of this litigation. Upon the termination of the litigation, Plaintiffs request that the document be destroyed.

Plaintiffs respectfully request leave to substitute D.I. 38 with a redacted version, filed hereto as Exhibit 1.

Dated: May 30, 2018

Respectfully submitted,

/s/ Misty A. Seemans

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² Based in CT; admitted in NY; does not practice in DC's courts.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document is being served this day by email on the following counsel of record for Defendants:

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